

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	NO. 08-148-LTS
)	
TAREK MEHANNA)	
_____)	

DEFENDANT'S ASSENTED-TO MOTION TO AMEND CONDITIONS OF BAIL

The defendant, Tarek Mehanna, moves that the Court amend his conditions of bail to set his curfew at midnight to 6:00 am. As grounds therefore, the defendant states the following:

1. A criminal complaint was filed against the defendant on November 7, 2008, and the defendant was arrested on November 10, 2008.
2. From November 10, 2008 to December 19, 2008, the defendant was in custody.
3. On December 19, 2008, this Court issued its Order Setting Conditions of Release, and the defendant was released into the custody of his parents.
4. As one condition of release, the defendant was restricted to his parents' and his residence from 8:00 pm to 8:00 am each night.
5. Pretrial Services Officer Toland Gladden informed the defendant's counsel on February 26, 2009, that since

his release, the defendant has complied with every condition of release, including his curfew.

6. The defendant's curfew has restricted his ability to take part in the activities of his religious community, which include mosque-oriented events and activities at which the defendant has been of service to others.
7. As an observant Muslim, the defendant does not drink alcohol or use drugs, nor does he engage in any activity that an early curfew is designed to protect against.
8. By amending the defendant's curfew, the defendant would not thereby be in increased danger of violating the conditions of his release.
9. On February 26, 2009, Toland Gladden informed the defendant's counsel that he approves of the defendant's motion to amend his curfew time.
10. On or about March 6, 2009, AUSA Aloke Chakravarty informed the defendant's counsel that he assents to this motion to amend his curfew time.

WHEREFORE, the defendant moves that the Court amend the conditions of his release to set his curfew from midnight to 6:00 am each night.

Tarek Mehanna
By His Attorneys

CARNEY & BASSIL

/s/ J. W. Carney, Jr.
J. W. Carney, Jr.
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Dated: March 31, 2009

Certificate of Service

I hereby certify that the above document has been served on all parties of record by mail, fax, electronic means, or in hand on or before the above date.

/s/ J. W. Carney, Jr.
J. W. Carney, Jr.

